



Linda S. Adams  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Maureen F. Gorsen, Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

September 10, 2007

Mr. B.B. Blevins  
Executive Director  
California Energy Commission  
1516 Ninth Street,  
Sacramento, California 95814

<b>DOCKET</b> <b>07-AFC-1</b>	
<b>DATE</b>	SEP 10 2007
<b>RECD.</b>	SEP 11 2007

REVIEW OF CALIFORNIA ENERGY COMMISSION (CEC) SUPPLEMENTAL  
DOCUMENTS FOR THE VICTORVILLE 2 HYBRID POWER PROJECT,  
DOCKET #07-AFC-1.

Dear Mr. Blevins:

The Department of Toxic Substances Control (DTSC) has received your submitted documents for the above-mentioned project. The following project description is stated in your document: "The City of Victorville (City), a municipal corporation in the State of California, submits this Application for Certification (AFC) to construct and operate the Victorville 2 Hybrid Power Project (referred to as the Victorville 2 Project, VV2 Project, or the Project). The Project consists of natural gas-fired combined-cycle generating equipment integrated with solar thermal generating equipment. The combined-cycle equipment will utilize two combustion turbine generators (CTG), two heat recovery steam generators (HRSG), and one steam turbine generator (STG). The solar thermal equipment will utilize arrays of parabolic collectors that heat a working fluid that is then used to generate steam. The combined-cycle equipment is integrated thermally with the solar equipment in that both utilize the Project's single STG. The Project will have a nominal electrical output of 570 MW and commercial operation is planned for the summer of 2010. The approximately 275-acre VV2 Project site is located north of the Southern California Logistics Airport (SCLA), the former George Air Force Base, in the City of Victorville, San Bernardino County, California. The site lies approximately 3.5 miles east of U.S. Highway 395 and approximately 0.5 mile west of the Mojave River. The site is in a portion of the southwestern Mojave Desert known as the Victor Valley." DTSC again provides comments as follows:

- 1) The AFC should identify any current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances.

- 2) The AFC should identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the AFC should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
  - Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
  - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
  - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
  - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
  - Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
  - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
  - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 3) The AFC should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No.17 below for more information.

- 4) Your document states: "Trichloroethylene (TCE) contamination in groundwater associated with the former George Air Force Base (GAFB - now SCLA) was identified as part of the GAFB Superfund site. TCE contamination associated with the GAFB Superfund site was found to extend through the locations associated with the proposed linear facilities near the VVWRA treatment plant. This TCE groundwater plume is present in the lower aquifer (approximately 210 to 250 below ground surface [bgs]) along the routes for the VV2 Project sanitary wastewater pipeline and transmission lines. No other issues of concern were identified. Summary of Findings and Conclusions. The presence of TCE-impacted groundwater near the VVWRA treatment plant is a recognized environmental condition (REC) in association with the VV2 Project linear facilities. Also, the potential was identified for de minimus hazardous materials or wastes (cleaning chemicals, petroleum product residues) to be present in abandoned vehicles and/or abandoned structures on the Project site. Although the depths of excavation associated with installation of VV2 Project linear facilities are not expected to approach the approximately 210 to 250-foot bgs depths where the TCE groundwater contamination exists (e.g., the excavations for Project pipelines are not expected to exceed 6 feet bgs and excavations for the transmission line structures are not expected to exceed 30 feet bgs), the most current data associated with the TCE plume should be obtained from the SCLA. This data should be obtained prior to construction activities associated with the linear facilities to confirm that the depths of TCE contamination are well separated from the depths of Project excavations along the linear routes. Construction planning should include consideration of the potential presence of hazardous materials or wastes (e.g., cleaning chemicals, petroleum product residues) associated with abandoned vehicles and/or abandoned structures on the site. Waste Management appropriate, additional investigation should be performed to establish the nature and extent of contamination, and identified hazardous materials/wastes (if present) should be managed and disposed in accordance with applicable regulations." Any environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.
- 5) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the

new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the AFC.

- 6) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property.
- 7) If buildings, other structures, or associated uses; asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.
- 8) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- 9) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- 10) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).
- 11) If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite,

or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (714) 484-5423 to initiate pre-application discussions and determine the permitting process applicable to the facility.

- 12) If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.
- 13) Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.
- 14) If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).
- 15) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.
- 16) If the site was used for agricultural or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.
- 17) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see [www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

Mr. B.B. Blevins  
September 10, 2007  
Page 6

If you have any questions regarding this letter, please contact Ms. Teresa Hom, Project Manager, at (714) 484-5477 or email at [thom@dtsc.ca.gov](mailto:thom@dtsc.ca.gov).

Sincerely,



Greg Holmes  
Unit Chief  
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov).

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
1001 I Street, 22<sup>nd</sup> Floor, M.S. 22-2  
Sacramento, California 95814  
[gmoskat@dtsc.ca.gov](mailto:gmoskat@dtsc.ca.gov)

CEQA#1629

## Docket Optical System - Fwd: Re: Victorville 2 Hybrid Power Plant Application - comments ??

**From:** John Kessler  
**To:** Docket Optical System  
**Date:** 9/11/2007 8:30 AM  
**Subject:** Fwd: Re: Victorville 2 Hybrid Power Plant Application - comments ??  
**Attachments:**

Dear Docket Staff:

Please docket the attached letter from DTSC to the Victorville 2 Project (07-AFC-1).

Thank you,

John

John S. Kessler  
CEC - Project Manager  
Office: 916-654-4679  
Cell: 530-306-5920  
Fax: 916-654-4421

>>> "Greg Holmes" <GHolmes@dtsc.ca.gov> 9/10/2007 3:30 PM >>>  
Cheryl, the letter went out today. Here is a PDF copy. Please call if you have questions.

Greg Holmes, Unit Chief  
Southern California Cleanup Operations  
Cypress Office  
direct (714) 484-5461  
fax (714) 484-5438

>>> "Cheryl Closson" <Cclosson@energy.state.ca.us> 8/29/2007 12:11 PM >>>  
Hi Greg-

This is Cheryl Closson at the Energy Commission. I used to work at DTSC HQ with Nancy Fallon. I was in the CEQA group for a short time on a T&D, but mostly worked in Hazardous Waste Management. Now I'm working on powerplant siting environmental reviews for soil, water, and waste. Nancy directed me to you regarding any DTSC review and comments on the Application for Certification (AFC) for the Victorville 2 Hybrid Power Plant in Victorville. We weren't sure if you had received the AFC and I just wanted to touch base with you to see if you had any comments, etc.

If you haven't received the AFC, it is posted on the CEC website at  
<http://www.energy.ca.gov/sitingcases/victorville2/documents/applicant/afc/>

All the other documents are posted as well on the website at  
<http://www.energy.ca.gov/sitingcases/victorville2/documents/index.html>

I'm working on the Preliminary Staff Assessment for the project now, so if you have any comments it would be great to have them. But if you haven't received the AFC, maybe I just can make note that DTSC is reviewing the document? or just not say anything "official". My apologies cause I'm just learning this process and so haven't gotten things in order or made the followup calls in time to give you all sufficient time to review and

comment!! So sorry !! But I wanted to give you a heads up and maybe talk with you sometime soon just to cover things?

Here's the basic situation: The site is largely on undeveloped property (north of the former George AFB property), so I was thinking there likely shouldn't be any significant issues, unless they find an illegal waste dump, drug lab, or some other problem. But apparently one of the transmission corridors is next to a closed landfill from George AFB and another party has raised issues about proximity to contaminated soil from the former base. In one question, the other party specifically brings up the Border Zone Property statute (HSC 25221) with respect to the George AFB property and asks whether or not DTSC has been notified for a determination of whether or not the project lies within 2000 ft within a "Border Zone" of George AFB.

I looked at the HSC sections and I think the other party got it wrong and didn't keep reading the statute, cause it appears the 2000 ft requirement only applies to certain structures for human habitation. Since the project structures in question are transmission lines, seems to me that the Border Zone Property requirement do not apply? The other party's (they are called "intervenors" in the CEC process) questions are attached below (they're not posted on the web yet but will be).

So.....those are the things I wanted to make sure you all saw. So sorry for not getting this info to you before !!! Please let me know what you think, okay? Greatly appreciate your help and consideration!

Cheryl Closson, P.G.  
California Energy Commission  
Siting Division, Environmental Office  
1516 Ninth Street, MS-40  
Sacramento, CA 96814  
(916) 651-0315